

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ESTATE OF TYRESE WEST,)	
Deceased, by Monique West and)	
Dwight Person, as Special)	Case No. 19-cv-1843
Co-Administrators,)	
)	
Plaintiffs,)	
)	Judge Brett Ludwig
v.)	
)	
INV. ERIC GIESE and VILLAGE)	
OF MOUNT PLEASANT, a)	
Municipal Corporation,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR LEAVE TO PRESENT ORAL
ARGUMENTS FOR DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

NOW COMES, the Plaintiff, the Estate of Tyrese West, deceased, by its administrators, Monique West and Dwight Person, through its attorneys, Gregory E. Kulis & Associates, Action Injury Law Group, and Strouse Law Officers, to respectfully request this Honorable Court to grant them leave to present oral arguments for Defendants' Motion for Summary Judgment, and in support of said motion, states as follows:

1. On February 15, 2022, Defendants filed a motion for summary judgment.
2. On April 1, 2022, Plaintiffs filed their response in opposition to Defendants' summary judgment motion.
3. On April 25, 2022, Defendants filed their reply in support of their motion.
4. Since then, Plaintiffs have reviewed Defendants' reply.
5. Upon reviewing Defendants' reply, Plaintiffs believe that oral arguments would benefit the court because Defendants conflated several points in their reply.

6. Moreover, allowing oral arguments would provide both parties an opportunity to clarify their positions and therefore serve the interests of justice.

7. Plaintiff believes that the parties' combined oral arguments could be completed in less than an hour, or any amount of time the court decides.

8. Plaintiff's counsel reached out to Defendants' counsel on Friday, June 17, 2022 to inquire whether this motion should be filed as opposed or unopposed, but received no response as of the time of this filing.

WHEREFORE, for the reasons outlined above, the Plaintiff, Estate of Tyrese West, deceased, through its administrators, Monique West and Dwight Person, respectfully request that this Honorable Court grant its Motion and set a hearing for oral arguments on Defendants' Motion for Summary Judgment, and any other relief it deems appropriate.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Gianna Gizzi", written over a horizontal line.

Gianna Gizzi, No. 6332727
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CERTIFICATE OF SERVICE

The undersigned non-attorney hereby certifies that the above **Plaintiff's Motion for Leave to Present Oral Arguments for Defendants' Motion for Summary Judgement** was filed on June 21, 2022, with the Northern District of Illinois ECF System, serving a copy on all parties.

/s/ Alexis M. Birge
Alexis M. Birge